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8 Attorney for Plaintiff

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11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE EASTERN DISTRICT OF CALIFORNIA

13 Joe Pires,  
14 Plaintiff,  
15 vs.  
16 Andrew Saul, Commissioner of Social Security,  
17 Defendant.

18 Case No. 2:20-cv-01073 KJN

19 **Stipulation of Extension of Time for Plaintiff to  
20 file brief in support of Motion for Summary  
21 Judgment; Order**

22 Plaintiff, by and through his attorney of record, and Defendant, by and through his attorney of  
23 record, hereby stipulate, subject to the approval of the Court, to a 14-day extension of time for Plaintiff's  
24 counsel to file a brief in support of his Motion for Summary Judgment, in light of the following:

- 25 1. Plaintiff's counsel has been unable to complete the brief due to the illness and departure of  
26 her paralegal. Counsel has had to do work that would otherwise have been done by her  
assistant. Counsel is in the process of hiring a new assistant and will soon be able to  
complete the brief.
- 27 2. Plaintiff's counsel has emailed Marcelo Illarmo, Esq., defendant's counsel. Mr. Illarmo  
28 has indicated that he is agreeable to a 14- day extension of time for counsel to prepare her  
brief.

3. Should the request be granted, Plaintiff's brief will be due on February 22, 2021, Defendant's reply brief on March 24, 2021, and Plaintiff's optional response brief on April 7, 2021.

Respectfully submitted,

Dated: February 5, 2021

/s/ Geri N. Kahn

GERIN N. KAHN

Attorney for Plaintiff

Dated: February 5, 2021

/s/ Marcelo N. Illarmo

## **MARCELO N. ILLAMO**

## Special Assistant United States Attorney

(\*By email authorization on February 5, 2021)

## ORDER

Pursuant to stipulation, IT IS ORDERED that:

Plaintiff's brief in support of the Motion for Summary Judgment is due on or before February 22, 2021; Defendant's response brief is due on or before March 24, 2021, and Plaintiff's optional reply brief is due on or before April 7, 2021.

Dated: February 8, 2021

Kendall J. Newman  
KENDALL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE